



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

OCT - 6 2014

Eric Grimm

McMurray, PA 15317-3671

RE: Pre-MUR 567

Dear Mr. Grimm:

The Federal Election Commission (the "Commission"), the regulatory agency that administers and enforces the Federal Election Campaign Act of 1971, as amended (the "Act"), has received information in the normal course of carrying out its supervisory responsibilities indicating that you may have violated provisions of the Act. Notification of this matter is being provided to you pursuant to the Commission's Agency Procedure for Notice to Respondents in Non-Complaint Generated Matters, published in the Federal Register on August 4, 2009 (74 Fed. Reg. 38,617).

Specifically, it has come to our attention that, in your former position as Vice President of Dana Mining and Dana Mining Pennsylvania, subsidiaries of Mepco Holdings, LLC ("Mepco"), you may have participated in an arrangement in which Mepco reimbursed you \$61,400 for federal campaign contributions, which took place between 2010 and 2013. The contributions are summarized below:

Name	Date	Amount	Aggregate	Election	Employer	Occupation
Citizens for Altmire						
Grimm, Eric	10/27/2010	2,000.00	2,000.00	G2010	Dana Mining	Coal Mining
Grimm, Cheryl L.	8/21/2011	1,500.00	1,500.00	P2012	Southwest Subway	Administrative Assistant
Grimm, Eric	8/21/2011	1,500.00	1,500.00	P2012	Dana Mining	Coal Mining Superintendent
Grimm, Eric	4/12/2012	1,000.00	2,500.00	P2012	Dana Mining	Coal Mining Superintendent
Capito for Congress						
Grimm, Eric	9/26/2010	\$500.00	\$500.00	G2010	Dana Mining	Coal Mining
Capito for West Virginia						
GRIMM, CHERYL MS	4/18/2013	\$2,600.00	\$2,600.00	P2014	SOUTHWEST SUBWAY INC.	ADMINISTRATIVE ASSISTANT

Name	Date	Amount	Aggregate	Election	Employer	Occupation
GRIMM, ERIC MR	4/18/2013	\$2,600.00	\$2,600.00	P2014	DANA MINING	COAL MINING
Mark Critz for Congress						
Grimm, Eric	9/14/2010	\$500.00	\$500.00	G2010	American Coal Co	VP Operations
Grimm, Cheryl L.	10/29/2010	\$1,000.00	\$1,000.00	G2010	Southwest Subway	Office Manager
Grimm, Eric	10/29/2010	\$1,900.00	\$2,400.00	G2010	American Coal Co	VP Operations
Grimm, Cheryl L.	12/23/2010	\$1,000.00	\$1,000.00	P2012	Southwest Subway	Office Manager
Grimm, Eric	12/23/2010	\$1,000.00	\$1,000.00	P2012	American Coal Co	VP Operations
Grimm, Cheryl L.	6/30/2011	\$1,500.00	\$2,500.00	P2012	Southwest Subway	Office Manager
Grimm, Eric	6/30/2011	\$1,500.00	\$2,500.00	P2012	American Coal Co	VP Operations
Grimm, Cheryl L.	8/28/2012	\$2,500.00	\$5,000.00	G2012	Southwest Subway	Office Manager
Grimm, Eric	8/28/2012	\$2,500.00	\$5,000.00	G2012	American Coal Co	VP Operations
Manchin for West Virginia						
GRIMM, ERIC S	8/17/2010	\$1,000.00	\$1,000.00	P2010	DANA MINING	EXECUTIVE
GRIMM, CHERYL L	4/10/2012	\$2,500.00	\$2,500.00	P2012	SOUTHWEST SUBWAY	ADMINISTRATIVE ASSISTANT
GRIMM, ERIC S	4/10/2012	\$2,500.00	\$2,500.00	P2012	DANA MINING	EXECUTIVE
Spike Maynard for Congress						
Grimm, Eric S. Mr.	10/20/2010	\$1,000.00	\$1,000.00	G2010	Dana Mining	Mining
McKinley for Congress						
GRIMM, CHERYL L	3/11/2010	\$500.00	\$500.00	P2010	MEPCO LLC	BUSINESSWOMAN
GRIMM, ERIC S	10/13/2010	\$2,400.00	\$2,400.00	G2010	N/A	RETIRED
Grimm, Cheryl	3/28/2011	\$2,500.00	\$2,500.00	P2012	Mepco Llc	Businesswoman
Grimm, Eric	3/28/2011	\$2,500.00	\$2,500.00	P2012	None	Retired
GRIMM, CHERYL L. MRS.	3/31/2013	\$2,600.00	\$2,600.00	P2014	NONE	RETIRED
GRIMM, ERIC S. MR.	3/31/2013	\$2,600.00	\$2,600.00	P2014	MEPCO LLC	EXECUTIVE

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Name	Date	Amount	Aggregate	Election	Employer	Occupation
Minear for Congress						
Grimm, Cheryl L	3/17/2010	\$500.00	\$500.00	P2010	Subway	Office Manager
Tim Murphy for Congress						
Grimm, Eric S. Mr.	8/26/2011	\$1,000.00	\$1,000.00	P2012	MEPCO	Coal mining
Oliverio for Congress						
Grimm, Cheryl	3/11/2010	\$2,400.00	\$2,400.00	P2010	Southwest Subway	Office Manager
Grimm, Eric S.	3/11/2010	\$2,400.00	\$2,400.00	P2010	Dana Mining	Coal Miner
Grimm, Eric S.	7/7/2010	\$1,400.00	\$3,800.00	G2010	Dana Mining	Coal Miner
Tom Smith for Senate						
GRIMM, ERIC	4/3/2012	\$2,500.00	\$2,500.00	P2012	DANA MINING	COAL MINING
GRIMM, CHERYL L	6/29/2012	\$2,500.00	\$2,500.00	G2012	NA	NA
GRIMM, ERIC S MR	6/29/2012	\$2,500.00	\$5,000.00	G2012	DANA MINING	VICE PRESIDENT
Snuffer for Congress						
GRIMM, ERIC S	9/21/2012	\$1,000.00	\$1,000.00	G2012	MEPCO, LLC	VICE PRESIDENT
	Total	\$61,400.00				

The Office of General Counsel is reviewing this information to determine whether to recommend to the Commission that there is reason to believe you may have knowingly and willfully violated 52 U.S.C. § 30122 (formerly 2 U.S.C. § 441f) by permitting your name to be used to effect contributions made in the name of another.

A “reason to believe” finding is not a finding that any person violated the Act; rather, it means only that the Commission believes a violation may have occurred. In the event the Commission finds that there is reason to believe, it may authorize the Office of General Counsel to conduct an investigation to determine whether, in fact, a violation occurred or to assess the scope of the alleged violation. *See* 52 U.S.C. § 30109(a)(2) (formerly 2 U.S.C. § 437g(a)(2)).

Before we make a recommendation to the Commission, we offer you the opportunity to provide a response in writing. Should you choose to respond, you may also submit any materials — including documents or affidavits from persons with relevant knowledge — that you believe may be relevant or useful to the Commission’s consideration of this matter. The Commission will take into account any additional information you provide in determining whether to find reason to believe that you violated the Act or Commission regulations.

Your response, if you choose to make one, must be submitted in writing within 15 days of this letter's receipt. After 15 days, we will make our recommendations to the Commission. The Commission will then consider the recommendations and take appropriate action.

This matter will remain confidential in accordance with 52 U.S.C. §§ 30109(a)(4)(B) and 30109(a)(12)(A) (formerly 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A)), unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by legal counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

Any correspondence sent to the Commission must be addressed as follows and should reference Pre-MUR 567:

Mail

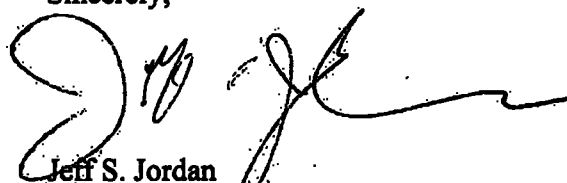
Federal Election Commission,
Office of Complaints Examination & Legal Administration
Attn: Mary Beth deBeau
999 E Street, NW
Washington, DC 20436

Email

mdebeau@fec.gov

If you have any questions, please contact me on our toll-free telephone number, (800) 424-9530. Our local telephone number is (202) 694-1650.

Sincerely,



Jeff S. Jordan
Assistant General Counsel
Complaints Examination
& Legal Administration

Enclosures:

Procedures
Designation of Counsel Form